

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 14-252 (JNE/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

INFORMATION

v.

JONATHAN JAMES PEREZ,

18 U.S.C. § 2251 (a)
18 U.S.C. § 2251 (e)
18 U.S.C. § 2253 (a)

Defendant.

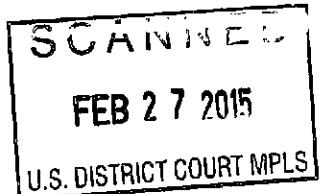
THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1
(Production of Child Pornography)

In or about December 2013, in the State and District of Minnesota, the defendant,

JONATHAN JAMES PEREZ,

having previously been convicted pursuant to the laws of the State of Texas relating to aggravated sexual abuse, sexual abuse and abusive sexual contact involving a minor, namely, a conviction for Solicitation to Commit Aggravated Sexual Assault of a Child, did knowingly employ, use, persuade, induce, entice, and coerce John Doe, a minor child, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions, digital video files: MOV 2013-12-04 13.09.01 and MOV 2013-12-04 13.20.08, were produced using materials that had been mailed, shipped, and transported and affecting interstate



and foreign commerce by any means, all in violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2253(a).

FORFEITURE ALLEGATIONS

Count 1 of this Information is hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

- (1) any visual depiction described in section 2251, 2251A, 2252, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property;

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code,

Section 2253(b). All in violation of Title 18, United States Code, Sections 2251(a) and
(e)

Dated: 2/21/15

ANDREW M. LUGER
United States Attorney

BY: DAVID P. STEINKAMP
Assistant U.S. Attorney